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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 JASON SADORA,

11 Plaintiff,

12 v.

13 FIELDING GRADUATE UNIVERSITY, a
14 business; DANIELLE MOREGGI, Clinical and
Training Director for the Psychology Institute
15 of Las Vegas in her individual and official
capacities; WENDI WILLIAMS, Provost at
16 Fielding, in her individual and official
capacities; CON-NIE VEAZEY, Program
17 Director, Clinical Psychology Department at
Fielding, in her individual and official
18 capacities; DOE INDIVIDUALS 4 through 50,
inclusive, in their individual and of-ficial
19 capacities; and DOE BUSINESS ENTITIES, 2
through 10, inclusive,

20 Defendants.
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Case No. 2:24-cv-01240-APG-EJY

**STIPULATION TO EXTEND DISCOVERY
DEADLINES**

(FIRST REQUEST)

22 Plaintiff Jason Sadora and Defendant Danielle Moreggi, by and through their undersigned
23 counsel of record, hereby submit the following Stipulation to Extend Discovery Deadlines in
24 accordance with LR 26-3 and LR IA 6-1.

25 This is the first request to extend the deadlines in the scheduling order (ECF No. 27), and
26 counsel submits that the request is brought in good faith, supported by good cause in compliance
27 with LR 26-3, is submitted at least twenty-one (21) days or more before the expiration of the subject
28 deadlines, and is not intended to cause delay.

A. DISCOVERY COMPLETED TO DATE (LR 26-3(a))

1. The Rule 26(f) conference was held on October 8, 2024.

2. Plaintiff and Defendant served their initial disclosures on October 23, 2024. Plaintiff served his first supplemental disclosures on November 20, 2024 and second supplemental disclosures on December 3, 2024.

3. On November 20, 2024, Plaintiff served his first set of requests for production of documents on Defendant. Defendant responded to these requests on December 30, 2024.

4. On February 13, 2025, Plaintiff served his first set of interrogatories, second set of requests for production of documents, and first set of request for admissions on Defendant.

5. On January 9, 2025, Plaintiff was deposed by former Defendants Fielding Graduate University, Wendi Williams, and Connie Veazey (“former Defendants”). During this deposition, Defendant expressly reserved the right to depose Plaintiff on another date and time.

B. DISCOVERY THAT REMAINS TO BE COMPLETED (LR 26-3(b))

The parties anticipate completing the following discovery:

1. Defendant’s responses to Plaintiff’s first set of interrogatories, second set of requests for production of documents, and first set of requests for admission are currently due on April 11, 2025;

2. Defendant will be serving her first set of interrogatories, requests for production of documents, and requests for admission to Plaintiff shortly;

3. Additional written discovery as needed in follow-up to the initial round of discovery;

4. Subpoenas to potential third parties for records;

5. Expert disclosures; and

6. Depositions of parties, potential third-party witnesses, and expert witnesses.

C. REASONS WHY DEADLINE WAS NOT SATISFIED/GOOD CAUSE FOR REQUEST (LR 26-3(c))

Discovery in this matter has been inadvertently delayed for legitimate reasons. Plaintiff has been engaged in settlement negotiations with the former Defendants in this case, which ultimately resulted in their dismissal. ECF No. 38. Second, on March 4, 2025, Defendant substituted her

counsel, who have been retained in this case for only a month. ECF No. 36. As a result, the parties believe that more time is necessary.

Separately, the parties need to decide whether to retain experts. After their initial round of discovery, the parties will conduct depositions but will not be able to have those completed and transcripts back before the April 24, 2025 initial expert deadline, should either side choose to retain an expert. The parties did not delay in setting depositions, as they wanted to have written discovery responses in hand before taking those depositions. Without an extension, experts will have to issue reports without the benefit of the deposition testimony and then supplement thereafter, which will involve increased expense. As such, the parties request an extension of ninety (90) days on the remaining deadlines to accommodate the additional time needed.

D. PROPOSED DISCOVERY SCHEDULE (LR 26-3(d))

Description	Current Deadline	Proposed Deadline
Last Day to Amend Pleadings or Add Parties	March 25, 2025	Unchanged
Last Day to Disclose Initial Expert Reports	April 24, 2025	July 23, 2025
Last Day to Disclose Rebuttal Experts	May 26, 2025	August 25, 2025¹
Last Day to Complete Discovery	June 23, 2025	September 22, 2025²
Last Day to File Dispositive Motions	July 23, 2025	October 21, 2025
Last Day to File Joint Pre-Trial Order	August 22, 2025	November 19, 2025 or thirty (30) days after a ruling on any dispositive motions

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¹ The proposed deadline falls on Sunday, August 24, 2025, which is a non-judicial day. FRCP 6(a)(1)(C).

² The proposed deadline falls on Sunday, September 21, 2025, which is a non-judicial day. FRCP 6(a)(1)(C).

IT IS SO STIPULATED.

DATED this 3rd day of April, 2025.

DATED this 3rd day of April, 2025.

WILSON, ELSE, MOSKOWITZ, EDELMAN
& DICKER LLP

THE LAW OFFICE OF ROBERT S. MELCIC

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ORDER

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: April 3, 2025